

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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KATTEN MUCHIN ROSENMAN LLP,

Plaintiff

-against-

KAYVAN HAKIM, YASSMINE HAKIM and
GREAT NORTHERN INSURANCE COMPANY,

Defendants.
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Index No. 07-CV-2921-BSJ

**DEFENDANT GREAT NORTHERN
INSURANCE COMPANY'S
NOTICE OF MOTION FOR
SUMMARY JUDGMENT AGAINST
PLAINTIFF KATTEN MUCHIN
ROSENMAN LLP**


PLEASE TAKE NOTICE that, upon the accompanying Affidavit of Robert Link, sworn on May 17, 2007, together with all exhibits attached thereto, the accompanying Memorandum of Law and Rule 56.1 Statement Of Material Facts, and all the papers and proceedings had herein, Defendant Great Northern Insurance Company ("GNIC") will move this Court at such time as the Hon. Barbara S. Jones deems proper under her individual practices and rules, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, before the Hon. Barbara S. Jones, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting GNIC summary judgment 1) ruling that GNIC is entitled to recover the \$150,000 in escrow funds wrongly held by Plaintiff Katten Muchin Rosenman LLP ("KMR"); 2) dismissing KMR's claims for indemnity from GNIC; and 3) such further relief as this Court may deem just and proper.

Oral argument is requested by GNIC in this matter. Opposition papers, if any, must be served 10 business days after service of the moving papers. Reply papers must be served 5 business days after service of the opposition papers.

Dated: New York, New York
May 17, 2007

MOUND COTTON WOLLAN & GREENGRASS

By:



Lloyd A. Gura (LG-0500)
Matthew J. Lasky (ML-6666)
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*Attorneys for Defendant Great Northern
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TO: Michael J. Verde, Esq.
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Attorneys for Defendants Kayvan Hakim and Yassmine Hakim

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss.:


Darlene M. Cho, being duly sworn, deposes and says:

Deponent is not a party to this action, is over the age of 18 years, and resides in Bronx, New York 10468. That on the 17th day of May, 2007 deponent served the annexed Defendant Great Northern Insurance Company's Notice of Motion for Summary Judgment Against Plaintiff Katten Muchin Rosenman LLP upon Michael J. Verde, Esq., Katten Muchin Rosenman, LLP, 575 Madison Avenue, New York, NY 10022-2585, attorneys for plaintiff and David J. Mark, Esq., Feder, Kaszovitz, Isaacson, Weber, Skala, Bass & Rhine, LLP, International Plaza, 750 Lexington Avenue, New York, NY 10022-1200, attorneys for defendants Kayvan Hakim and Yasmine Hakimat the address designated by said attorneys by depositing the same enclosed in a postpaid properly addressed wrapper directed to each of said attorneys at the above addresses in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York.



DARLENE M. CHO

Sworn to before me this
17th day of May, 2007


Notary Public

KATHRYN ALBA
NOTARY PUBLIC, State of New York
No. 01AL4733320
Qualified in Richmond County
Commission Expires August 31, 20 09